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16 **UNITED STATES DISTRICT COURT**

17 **DISTRICT OF NEVADA**

18 SUSAN BEAMAN, } Case No: 2:15-cv-02393-APG-VCF
19 Individually, }
20 Plaintiff, }
21 vs. }
22 BOYD GAMING CORPORATION, a }
23 Nevada corporation; }
24 DOES 1-10, inclusive; ROE }
25 CORPORATIONS 1-10, inclusive, }
Defendant. }

19

STIPULATED DISCOVERY PLAN AND SCHEDULING ORDER

20 Plaintiff, SUSAN BEAMAN, by and through her undersigned counsel, KIRK T.
21 KENNEDY, ESQ., and the Defendant, BOYD GAMING CORPORATION, INC., by and
22 through its undersigned counsel, SCOTT M. ABBOTT, ESQ. and KAITLIN H.
23 ZIEGLER, ESQ. of the firm of Kamer Zucker Abbott, hereby submit this Stipulated
24 Discovery Plan and Scheduling Order. The parties conducted a Rule 26(f) conference on
25 January 27, 2016.

26 **DESCRIPTION OF ACTION:** This case asserts claims under the Age
27 Discrimination in Employment Act and the Americans with Disabilities Act. Defendant
28 denies all claims for relief.

1 **Proposed Discovery Schedule:**

- 2 1. Estimated time required for discovery: Discovery will take 180 days from the filing of
3 the Defendant's first appearance in the matter on January 22, 2016. The discovery
4 deadline shall be July 20, 2016.
- 5 2. Amendment of Pleadings and Addition of Parties: Unless otherwise ordered by the
6 Court, the date for filing motions to amend the pleadings or to add parties shall not be
7 later than 90 days prior to the discovery cut-off date, which in this matter is not later than
8 April 21, 2016.
- 9 3. The disclosure of experts and expert reports shall occur on or before May 20, 2016,
10 which is 60 days before the discovery cut-off date; and the disclosure of rebuttal experts
11 and their reports shall occur on or before June 20, 2016, which is 30 days after the expert
12 disclosure deadline.
- 13 4. Interim Status Report: On or before May 20, 2016, the parties shall file an interim
14 status report as required by LR 26-3, stating the time required for trial, three alternative
15 dates of trial, and whether or not trial will be proceeding or affected by substantive
16 motions.
- 17 5. The parties shall have until August 19, 2016, to file dispositive motions. This is 30
18 days after the discovery cut-off date and does not exceed the outside limit of thirty (30)
19 days following the discovery cut-off date that LR 26-1(e)(4) presumptively sets for filing
20 dispositive motions.
- 21 6. The pretrial order shall be filed by September 19, 2016, which is not more than thirty
22 (30) days after the date set for filing dispositive motions in the case. This deadline is
23 suspended if dispositive motions are timely filed and, in such case, the deadline for filing
24 the pretrial order shall be thirty (30) days after decision on said dispositive motions, or by
25 further order of the court. The disclosures required by FRCP Rule 26 (a)(3) shall be
26 made in the joint pretrial order.
- 27 7. Stipulations regarding limitations or conditions or additional discovery:
28 a. Parties shall engage in all permissible discovery as allowed under the FRCP and local

rules.

1 8. Extensions of Modifications of the Discovery Plan and Scheduling Order:
2 Applications or motions to extend the discovery plan dates shall comply with the
3 requirements of LR 6-1 and LR 26-4 and shall be filed 21 days prior to the particular
4 deadline sought to be extended. The motion or stipulation shall include:

- 5 a. A statement specifying the discovery completed to date;
6 b. A specific description of the discovery which remains to be completed;
7 c. The reasons why remaining discovery was not completed within the time
8 limits of the existing discovery deadline; and
9 d. A proposed schedule for the completion of remaining discovery.

10 9. Settlement: The undersigned attorneys affirm that they have discussed possible
11 settlement of this action as well as the use of extrajudicial procedures or alternative
12 methods of dispute resolution to resolve this case.

13
14 /s/Kirk T. Kennedy
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20 Attorney for Plaintiff

21 Dated: 1/28/16

22 /s/Scott M. Abbott
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31 Attorneys for Defendant

32 Dated: 1/28/16

33 **ORDER**

34 IT IS SO ORDERED.

35 Dated this 29th day of January, 2016.

36 
37 UNITED STATES MAGISTRATE JUDGE